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UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PORTLAND DIVISION

TYLER MILLER, an individual,

Plaintiff,

vs.

Case No. 3:23-cv-00293-SI

SECOND DECLARATION OF TYLER
MILLER

HENRY HEIMULLER, in his official capacity
as Board Member of the Columbia 9-1-1
Communications District; BRUCE HOLSEY,
in his official capacity as Board Member of the
Columbia 9-1-1 Communications District;
JEFF FLATT, in his official capacity as Board
Member of the Columbia 9-1-1
Communications District; and SHELLEY
HENNESSY, in her official capacity as Board
Member of the Columbia 9-1-1
Communications District,

Defendants.

I, Tyler Miller, declare as follows:

1. I am over the age of 18. Unless otherwise noted, I declare the following based on personal knowledge. If called upon to do so, I would testify truthfully as follows.

2. I wish to assemble in person with members of the public and other local government officials at public meetings of the Columbia 9-1-1 Communications District (the "District"). I also want to encourage others to join me at those meetings to demonstrate public interest and concern, even if they say nothing, by sitting across from the directors deciding serious public issues, specifically the sole-source Motorola Solutions proposal and proposed systems merger with Washington County.

3. The allegations set forth in Defendants' submitted declarations are blatantly false.

4. All District board meetings are conducted in the same room: a board room that is separated by locked doors from the rest of the District facility and the dispatch room.

5. In 2016-2017, I was a subcontractor for the District.

6. I categorically deny harassing or bullying anyone at the District, whether during my time as a subcontractor, reserve sheriff, or otherwise.

7. Attached hereto as Exhibit 1 are true and correct copies of text messages between myself and Chandra Egan ("Egan") from October 22, 2015 to January 25, 2017. Egan produced these text messages in response to a subpoena in a separate litigation.

8. Attached hereto as Exhibit 2 are true and correct copies of excerpts of the transcript of Egan's deposition on February 4, 2020 in another litigation.

9. I am openly gay, which Egan knew during the entire time period of the text messages attached hereto as Exhibit 1.

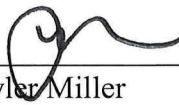
10. Since October 22, 2015, I have attended numerous meetings in person, all without incident: from October 22, 2015 to April 23, 2020, the date the District meetings went virtual only due to COVID, I attended over 70 District meetings in person; from the last text message dated January 25, 2017 until virtual only, I attended 55 District meetings in person; the District resumed in-person meetings on March 31, 2022 and between that date and February 23, 2023, I

attended 15 in-person meetings.

11. All District 9-1-1 emergency, non-emergency and administrative telephone lines used by on duty dispatchers are recorded.

12. District employees are required to report misuse of CJIS, CAD and other systems. I am not aware of any report accusing me of misusing CJIS, CAD or other public safety, criminal justice systems. Dannell Hooper's declaration accusing me of misusing emergency communications systems is untrue.

I declare under penalty of perjury that the foregoing is true and correct, and that I executed this declaration on March 8, 2023, at Scappoose, Oregon.


Tyler Miller

4863-8768-2390